

UNITED STATES DISTRICT COURT

Southern

District of

New York

SONYA WHITTEN LATIMORE

v

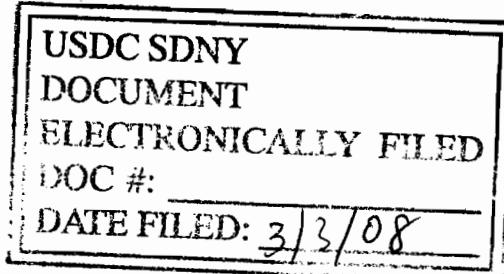
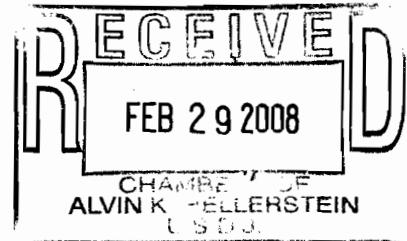
**ANSWER TO SUMMONS IN A CIVIL ACTION**

**Kim Fuller individually & as partner of McCreary & Fuller Public Relations Co.**

**Complaint # 07CIV9338 / Judge Hellerstein**

**ANSWER BEING SERVED ON PLAINTIFF**

SONYA WHITTEN LATIMORE  
87 - 30 204 Street #B78  
Queens, N.Y. 11423  
(718) 776 - 5084  
Pro- Se



COURT COPY

The summons to vacate  
service is denied,  
The Answer is accepted,  
and the case shall  
proceed.  
n-29-08

Alvin Hellerstein

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X

Sonya Whitten Latimore

Plaintiff,

-against-

**ANSWER AND RESPONSE TO  
COMPLAINT #07CIV9338  
JUDGE HELLERSTEIN**

KIM FULLER, individually and as partner of  
McCreary & Fuller Public Relations Co.

-----X

Defendant, Kim Fuller responds to the plaintiffs allegations as follows:

1. Plaintiff never properly served defendant Kim Fuller, the summons and complaint was found on the floor in his vestibule. It was not received in any envelope addressed to plaintiff, furthermore it was not left with anyone to give to plaintiff. The document was just left on the floor with the other junk fliers and advertisements.

Items on complaint numbers 3 - 11 (Naming the parties) I, Kim Fuller, do not have any comment, due to having no relationships with any of the referenced people given as follows: NBC UNIVERSAL, INC., 3 BALL PRODUCTIONS, INC., REVEILLE LLC, BEN SILVERMAN, 25/7 PRODUCTIONS, LLP, DANIEL TIBBETS, TWENTIETH TELEVISION, INC, SHINE LIMITED OR ANDREW HILL.

12. True, I, Kim Fuller am a partner with McCreary and Fuller Public Relations Co.

13. Not Applicable

14. I, Kim Fuller, as a partner of McCreary & Fuller P.R. Co. do represent entertainment clients, who have signed, contractual agreements with our company. I or our firm do NOT represent persons who were never issued contractual representation agreements. (Which include the compensation due to our firm for such representation)

15. Please refer to response for 14.

**RESPONSE TO "BREACH OF IMPLIED CONTRACT"**

16. Not Applicable

17. I guess that may be true.

18. I can agree with that, due to my friend having contacted me about it.

19. True

20. Plaintiff stated herself, that the business relationship would commence upon receiving a JOINT VENTURE PARTNERSHIP AGREEMENT between McCreary & Fuller P.R. Corp. and herself. This agreement was NEVER ISSUED by her own admission. SHE NEVER BECAME A CLIENT. Therefore, without a written compensation arrangement for our firm, I or my firm had NO REASON to even show her treatment to my partner Mr. Bill McCreary

21. False, I never showed any treatment to co defendants I don't know, and furthermore had no reason to Do so. Therefore, there would be no meetings or discussions to discuss with Ms. Latimore, who never officially was our client.

22. - 24. Not Applicable - (Meaning I have no comment, because I can not confirm or deny)

25. Absolutely False

26. If I would have felt the project was worth putting any effort whatsoever, I would have immediately Issued plaintiff an agreement for representation (Which would have stated our compensation) I DID NOT! UPON REVIEW I DID NOT FEEL THE EFFORT WAS WORTH IT.

27. DEFENDANT FULLER DID NOT HAVE ANY AGREEMENT TO BREACH, THAT IS WHY THERE WAS NO FURTHER CONTACT ATTEMPTED BY DEFENDANT TO PLAINTIFF OR VICE VERSA, (UNTIL THIS FRIVILOUS LAW SUIT APPEARED IN A PILE OF GARBAGE ON FEBRUARY 8<sup>TH</sup> OF THIS YEAR.

MOTION TO DISMISSAL OF CASE

I, Kim Fuller, hereby request that this case regarding my name and the name of my company McCreary and Fuller P.R. Co. and partner Bill McCreary be removed, expunged or dismissed from any further action regarding this matter. I am attaching the proof of proper service to the plaintiff through certified mail, with your copy to the courts.

I, Kim Fuller, hereby declare, under the penalty of perjury, that the foregoing is true and correct.

Signed this day of February 28, 2008



KIM FULLER  
DEFENDANT  
291 Hemlock Street  
Brooklyn, N.Y. 11208  
(718) 827 - 7569

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HOLLIS NY 11423

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Restricted Delivery Fee (Endorsement Required)	\$ 0.00	
Total Postage & Fees	\$ 5.77	02/28/2008

Sent to **SONYA WHITTEN LATIMER**  
Street, Apt. No.: **81-30 204<sup>ST</sup> #B78**  
or PO Box No.   
City, State, ZIP+4 **QUEENS, NY 11423**

PS Form 3800, August 2006 See Reverse for Instructions